

Exhibit 1

From: Greg Hollon <GHollon@mcnaul.com>
Sent: Wednesday, October 12, 2022 2:13 PM
To: Campbell, Eamonn W.; Maya Jumper; Rudzin, Abby F.; Daniel Stone; Timothy B. Fitzgerald; Tether Litigation
Cc: Lisa Nelson; Elisabeth J. Guard; Matt Monkress
Subject: RE: In re Tether Bitfinex - Plaintiffs' Proposed Search Terms

[EXTERNAL MESSAGE]

Maya,

Following up on our last meet/confer, you asked about whether Bittrex uses Telegram. Bittrex does not use Telegram, and has no Telegram data for any of its employees (including for Mr. Shihara). Bittrex acknowledges that some employees may have used Telegram at various times, but it would not have been for official company business.

Since you flagged a Telegram chat that appeared to include Bill Shihara, we inquired as to his potential use of the Telegram. We are informed that he used it personally at times. However, he did not keep any of the data/chats, so would not have anything to produce (even if the company had an obligation to produce his personal information—a concept with which we don't necessarily agree).

I trust this answers your questions, but certainly let me know if you want to talk it over further.

Best, Greg

Gregory J. Hollon | Attorney



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